

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
UNITED STATES OF AMERICA)	
)	
v.)	Criminal Action No. 19-cr-10335
)	
TANMAYA KABRA)	
)	
)	
_____)	

**DEFENDANT TANMAYA KABRA’S ASSENTED TO MOTION FOR LEAVE TO FILE
UNDER SEAL HIS MOTION IN OPPOSITION TO THE GOVERNMENT’S
MOTION FOR RESTITUTION**

Pursuant to Local Rule 7.2, Defendant Tanmaya Kabra requests the Court’s permission to file under seal his Motion in Opposition to the Government’s Motion for Restitution (“Opposition”).

As ground for this motion, Defendant states as follows:

1. On April 8, 2019, Defendant pled guilty to four counts of wire fraud in violation of 18 U.S.C. § 1343.
2. On August 19, 2021, the Government filed an assented to Motion to Seal its Motion for Restitution.
3. On August 19, 2021, the Court granted the Government’s motion.
4. On August 20, 2021, the Government filed a Sealed Motion for Restitution. The motion identifies victims by name, refers to the amount of their losses, and otherwise described or identifies them. A redacted version was filed on the public docket.

5. In order to respond to this motion, Defendant anticipates that his Opposition will identify the same individuals by name, refer to the amount of loss the government identifies, and otherwise describe and/or identify them.

6. To protect the privacy of these individuals, in accordance with the Crime Victim Rights Act, 18 U.S.C. § 3771(a)(8), Defendant requests leave to file his Opposition and exhibits thereto under seal. If this motion is granted, Defendant will file a redacted version on the public docket removing the individual's identifying information.

7. Counsel for the Government, Assistant U.S. Attorney Christopher Looney, assents to Defendant's request for leave to file under seal.

WHEREFORE, Defendant respectfully requests that the Court grant this motion for leave to file his Opposition Under Seal.

Respectfully submitted,

TANMAYA KABRA

By his attorneys,

/s/ Michael J. Connolly
Michael J. Connolly
Julianna Malogolowkin
HINCKLEY, ALLEN & SNYDER LLP
28 State Street
Boston, MA 02109
mconnolly@hinckleyallen.com
jmalogolowkin@hinckleyallen.com
Tel. (617) 345-9000
Fax (617) 345-9020

CERTIFICATE OF SERVICE

I hereby certify that on September 2, 2021, a copy of the foregoing Sentencing Memorandum was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the court's CM/ECF System.

/s/ Michael J. Connolly